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April 27, 2005

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Public Service Commission of South Carolina
Attn: Docketing Department
P.O. Drawer 11649
Columbia, SC 29211

Re: Docket No. 2005-6-G

Dear Sirs:

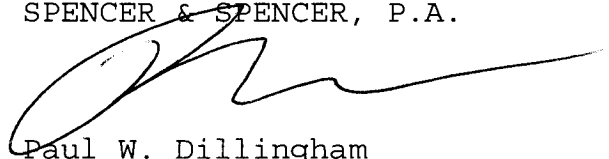
Enclosed please find the original and six (6) copies of a Petition to Intervene and a Certificate of Service by Mail in the above referenced matter. Please file these documents with the records of your office and return clocked copies to me in the enclosed envelope.

By copy of this letter, I am hereby serving the Petition to Intervene and Certificate of Service by Mail on all parties listed on the Certificate of Service by Mail.

With kindest regards, I remain

Respectfully,

SPENCER & SPENCER, P.A.


Paul W. Dillingham

Enclosures

cc: Michael Enoch
Tim Thornton
James A. Heckle

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BEFORE THE
PUBLIC SERVICE COMMISSION
OF SOUTH CAROLINA

Docket No. 2005-6-G

Chester County Natural Gas)
Authority, Lancaster County)
Natural Gas Authority,)
York County Natural Gas)
Authority, and Patriots)
Energy Group,)

Petitioners.)

In Re:)

Annual Review of Purchased)
Gas Adjustments and Gas)
Purchasing Policies of South)
Carolina Pipeline Corporation.)

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PUBLIC SERVICE COMMISSION

PETITION TO INTERVENE

NOW COMES Lancaster County Natural Gas Authority (hereinafter "LCNGA"), York County Natural Gas Authority (hereinafter "YCNGA"), Chester County Natural Gas Authority (hereinafter "CCNGA") and Patriots Energy Group (hereinafter "PEG") before the South Carolina Public Service Commission, Utilities Division, petitioning to intervene in the above captioned matter, on the following grounds:

1. Petitioners are special purpose districts and a joint action agency organized in accordance with South Carolina law to separately and/or jointly deliver and/or supply natural gas to

OK D. Duke

residential, industrial and other customers located in Chester, Union, Lancaster, Kershaw, York and Cherokee Counties.

2. The duly authorized representative of the Petitioners for purposes of this docket is the undersigned whose name and address appears below.

3. A matter before this Commission is its Order No. 87-1122 which requires the annual review of the Purchased Gas Adjustment and the Gas Purchasing Policies of South Carolina Pipeline Corporation (together, the Issues). The Issues relate to, among other things, the price of gas sold by South Carolina Pipeline Corporation (SCPC) to Petitioners.

4. Because this proceeding affects the price which Petitioners pay for gas and correspondingly, the price which Petitioners must then charge their customers, denial of the right of Petitioners to intervene would impair or impede the ability of each to protect gas prices paid and charged by them.

5. Although PSC R. 103-836(3)(c) requires that the position of Petitioners on the Issues be set forth in this Petition, Petitioners are unable to formulate their position until SCPC's position on the Issues has been made known. Likewise, although the notice of hearing on the Issues requires Petitioners to notify SCPC and the PSC if Petitioners intend to offer any testimony and/or evidence at the hearing, Petitioners are unable to furnish

any notice until SCPC has pre-filed with the PSC and served on Petitioners its proposed testimony and evidence.

WHEREFORE, Petitioners hereby seek, pursuant to PSC R. 103-836 (or other applicable or analogous rule/regulation), intervention in this matter, including, but not limited to, the rights to receive copies of all notices, pleadings, discovery material and other related correspondence; to appear as a party; to offer testimony and other evidence; and to cross-examine witnesses at any hearings, in support of their position.

SPENCER & SPENCER, P.A.

By: 

Paul W. Dillingham
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COMMUNICATIONS

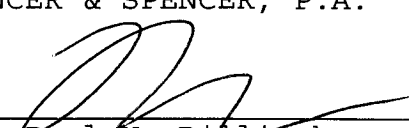
South Carolina Pipeline Corporation
P.O. Box 102407
Columbia, SC 29224-2407
Attn: Mr. George Fasano, Jr.
Vice President and Controller

C. Dukes Scott
Office of Regulatory Staff
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